



BellSouth Telecommunications, Inc.  
333 Commerce Street, Suite 2101  
Nashville, TN 37201-3300

guy.hicks@bellsouth.com

March 28, 2002

REC'D TN  
REG. AUTH.  
Guy M. Hicks  
General Counsel

'02 MAR 28 PM 12 00  
615 214 6301  
Fax 615 214 7406  
OFFICE OF THE  
EXECUTIVE SECRETARY

VIA HAND DELIVERY

David Waddell, Executive Secretary  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, TN 37238

Re: *Petition of MCImetro Access Transmission Services, LLC and Brooks  
Fiber Communications of Tennessee, Inc. for Arbitration of Certain  
Terms and Conditions of Proposed Agreement with BellSouth  
Telecommunications, Inc. Concerning Interconnection and Resale  
Under the Telecommunications Act of 1996*  
Docket No. 00-00309

Dear Mr. Waddell:

Enclosed are the original and thirteen copies of the parties' Joint Motion for Arbitrators to Resolve Issue. Counsel for WorldCom has authorized me to submit this Motion on WorldCom's behalf. A copy of the enclosed is being provided to counsel of record.

Very truly yours,

  
Guy M. Hicks

GMH:ch

BEFORE THE TENNESSEE REGULATORY AUTHORITY  
Nashville, Tennessee

In Re: *Petition of MCImetro Access Transmission Services, LLC and Brooks Fiber Communications of Tennessee, Inc. for Arbitration of Certain Terms and Conditions of Proposed Agreement with BellSouth Telecommunications, Inc. Concerning Interconnection and Resale Under the Telecommunications Act of 1996*

Docket No. 00-00309

**JOINT MOTION FOR ARBITRATORS TO RESOLVE ISSUE**

BellSouth Telecommunications, Inc. ("BellSouth") and WorldCom subsidiaries MCImetro Access Transmission Services, LLC and Brooks Fiber Communications of Tennessee, Inc. ("WorldCom") respectfully request that the Directors of the Authority, acting as arbitrators, assist the parties in resolving the one remaining issue related to this proceeding. Specifically, the parties request the assistance of the arbitrators in resolving a disagreement over contract provisions found in Attachment 3, Section 13.7, relating to Issue 28.<sup>1</sup> Despite good faith efforts, the parties have been unable to agree to contract language implementing the arbitrators' decision with respect to Issue 28. With respect to all other issues, the parties have either reached agreement or have agreed to include language in the interconnection agreement that represents the decision of the arbitrators. With the exception of contract language regarding Issue 28, the interconnection agreement is otherwise ready to be submitted to the Authority for review and approval.

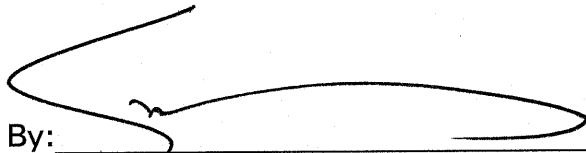
---

<sup>1</sup> Issue 28 is: Should BellSouth provide the Calling Name Database via electronic download, magnetic tape or via similar convenient media?

Assuming the Authority grants this Motion, the parties propose to file comments setting forth their positions regarding the contract language to be adopted with respect to Issue 28. Each party believes that the language it is advocating for Attachment 3, Section 13.7, accurately implements the decision made by the arbitrators on December 18, 2001. If this Motion is granted, the parties believe they can submit their comments to the Authority expeditiously, within five business days.

Respectfully submitted,

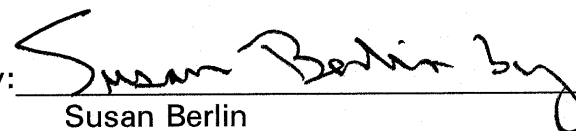
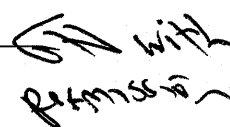
BELLSOUTH TELECOMMUNICATIONS, INC.

By: 

Guy M. Hicks  
333 Commerce Street, Suite 2101  
Nashville, TN 37201-3300  
615/214-6301

Michael Twomey  
675 W. Peachtree St., NE, Suite 4300  
Atlanta, GA 30375

MCImetro ACCESS TRANSMISSION SERVICES, LCC  
BROOKS FIBER COMMUNICATIONS OF TENNESSEE,  
INC.

By:   with  
return  
Susan Berlin  
Six Concourse Pkwy, #3200  
Atlanta, GA 30328

## CERTIFICATE OF SERVICE

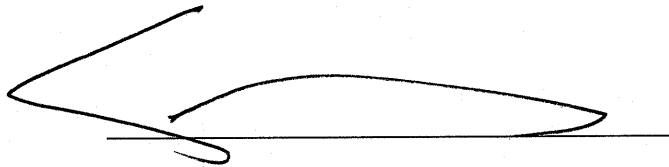
I hereby certify that on March 28, 2002, a copy of the foregoing document was served on the parties of record, via the method indicated:

☐ Hand  
☐ Mail  
☒ Facsimile  
☐ Overnight

Jon E. Hastings, Esquire  
Boult, Cummings, et al.  
P. O. Box 198062  
Nashville, TN 37219-8062

☐ Hand  
☐ Mail  
☒ Facsimile  
☐ Overnight

Susan Berlin  
Dulaney L. O'Roark, III  
MCI WorldCom, Inc.  
Six Concourse Pkwy, #3200  
Atlanta, GA 30328

A handwritten signature in black ink, consisting of a large, stylized 'S' or 'B' shape, followed by a horizontal line.

**CASE NAME: Petition of MCImetro Access Transmission Services, LLC and Brooks Fiber For Arbitration of Certain Terms and conditions of Proposed Agreement with BellSouth Concerning Interconnection and Resale Under Telecommunications Act of 1996**

**Docket No. 00-00309**

**File: 6**

ITEM NO:	DATE FILED:	DOCUMENT
1	05/10/01	Deposition of Mr. Don Price, which is Hearing Exhibit 7.
2	05/21/01	Errata sheets which should be appended to the depositions of Alphonso J. Varner, Ronald M. Pate, David Scollard and W. Keith Milner previously filed.
3	05/22/01	Transcript of Proceedings, Tuesday, May 8, 2001 Vol. I
4	05/22/01	Transcript of Proceedings, Tuesday, May 8, 2001 Vol. II
5	06/07/01	Joint Motion for extension of time to file post-hearing briefs. All parties to this proceeding jointly request the extension.
6	06/08/01	Notice of Arbitration Hearing.
7	06/26/01	Order Granting Motion for Extension of Time to File Post-Hearing Briefs.
8	06/27/01	Transcript of Proceedings, Tuesday, June 12, 2001.
9	07/06/01	BellSouth's Post-Hearing Brief.
10	07/06/01	Post-Hearing Brief of WorldCom.
11	08/17/01	BellSouth and WorldCom have reached a settlement on issues in all BellSouth states on August 13, 2001/
12	01/11/02	BellSouth's Best and Final Offers for Issues 55, 67 and 95.
13	01/11/02	Best and Final Offer (Issues 55, 67 and 95) and the Supplemental Brief on Issue 67 of WorldCom.
14	01/14/02	New Page 3 to replace Page 3 of the supplemental brief on Issue 67 of WorldCom filed earlier today.
15	01/28/02	Motion of WorldCom to Strike Pages of BellSouth's Best and Final Offer for Issue 95.
16	02/05/02	BellSouth has no record of receiving the hand delivered copy of the Motion to Strike filed by MCI on January 28. BellSouth did not receive the mailed copy until Feb. 5, 2002.
17	02/11/02	BellSouth's Opposition to WorldCom's Motion to Strike Pages of BellSouth's Best and Final Offer for Issue 95.
18	03/28/02	Parties' Joint Motion for Arbitrators to Resolve Issue.
19	04/03/02	Interim Order of Arbitration Award.
20	04/18/02	BellSouth's Motion for Reconsideration and Clarification.
21	04/19/02	BellSouth's Proposed Contract Language for Issue 28.
22	04/19/02	WorldCom's Best and Final Offer with respect to Issue 28.
23	04/24/02	Final Order of Arbitration Award.
24	04/30/02	Order Granting Joint Motion for Arbitrators to Resolve Issue.
25		
26		
27		
28		
29		
30		